

McKool Smith

Daniel W. Levy
Direct Dial: (212) 402-9412
E-mail: dlevy@mckoolsmith.com

1301 Avenue of the Americas
32nd Floor
New York, NY 10019

Telephone: (212) 402-9400
Facsimile: (212) 402-9444

August 19, 2024

By ECF

The Honorable Naomi Reice Buchwald
United States District Judge
Southern District of New York
500 Pearl Street, Room 2270
New York, New York 10007

Re: Stein and Lhote v. Skatteforvaltningen
23 Civ. 2508 (NRB)

Dear Judge Buchwald:

Plaintiffs Matthew Stein and Jerome Lhote and Nominal Defendant Luke McGee respectfully submit this letter to request that the Court further adjust the schedule for the completion of expert discovery.

The Court had most recently ordered that expert discovery be completed by October 25, 2024. ECF No. 131.

Stein, Lhote, and McGee respectfully request that the Court adjust the expert discovery schedule such that it would be completed by November 11, 2024.

The reason for the requested modification is because the expert retained by Plaintiffs and McGee contracted a serious eye infection and was, for practical purposes, incapacitated for roughly a week and has not been able to complete his report.

Beyond this unforeseeable circumstance, some days of the modestly extended schedule are sought to account for Labor Day and the Jewish holidays in early October.

The Court's prior expert discovery scheduling orders are located at ECF Nos. 98, 121, and 127.

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Counsel for Skatteforvaltningen has consented to the requested modification and to entry of the proposed revised scheduling order that accompanies this letter.

Respectfully submitted,

/s/

Daniel W. Levy

Encl.

cc: All Counsel (by ECF)